cept when it is inconsistent with some constitutional provision which comes within judicial cognizance. COOLEY, CONSTITUTIONAL LIMITATIONS, 7 ed., p. 236. An enactment of the legislature, no matter how freakish in nature, cannot be declared void by the courts if it has any reasonable bearing upon the protection of public health, morals, safety, order or welfare. *Hammer* v. *State*, 173 Ind. 199, 89 N. E. 850. Moreover, if the statute has a direct relation to the evil sought to be remedied, it is not fatal that it may affect those innocent of the evil at which it is aimed. *United States* ex rel. *Turner* v. *Williams*, 194 U. S. 279, 294. The regulation of street parades is, of course, within the police power of the state, and statutes or ordinances on the subject will be sustained unless unreasonable, or outside the scope of the powers delegated to the municipality. *Commonwealth* v. *Plaisted*, 148 Mass. 375, 19 N. E. 224. *Cf. Anderson* v. *City of Wellington*, 40 Kan. 173, 19 Pac. 719. The police power, however, has some limits. Thus legislation making it a crime for a girl under twenty-one to enter a Chinese restaurant, or a statute requiring horseshoers to pass an examination, would be invalid. *Opinion of the Justices*, 207 Mass. 601, 94 N. E. 558; *Bessette* v. *People*, 193 Ill. 334, 62 N. E. 215. But in the principal case it would seem that the carrying of a red flag has enough of a connection with acts of disorder to warrant the enactment of the statute in the interest of public order. Opinions may differ as to its policy, but if there is dissatisfaction, recourse must be had to the legislature and not to the courts.

POWERS — APPOINTMENT TO REMAINDERMAN — EFFECT OF PARTIAL APPOINTMENT TO OTHERS ON RIGHT TO ELECTION. — The testator left property in trust for his daughter for life, then to such persons as she should by will appoint, and in default of such last will to be distributed as if she had died intestate. By will she appointed part of the fund for the payment of debts, and the balance to those who would have taken on default of appointment. These appointees now seek to escape payment of the transfer tax by electing to take under the original will instead of under the power. *Held*, that they must take under the power. *Estate of Josephine Slosson*, N. Y. L. J., Nov. 5, 1914 (Surr. Ct., N. Y. County).

Where a power of appointment is completely exercised in favor of the person who would take in default of appointment, the New York courts have held that he can elect to take under the will instead of under the power. *Matter of Lansing*, 182 N. Y. 238, 74 N. E. 882; *Matter of Haggerty*, 128 App. Div. 479, 112 N. Y. Supp. 1017. The argument is that, while there has been at least a formal exercise of the power, the remainderman takes nothing different than he would have had under the original will, and should therefore be permitted to elect to disregard the appointment. Somewhat analogous is the case where land is specifically devised to the heir. There the law has been that the worthier title prevails and that the heir takes by descent. *Sedgwick* v. *Minot*, 6 Allen (Mass.) 171. But this rule has been changed in England by statute, so that the heir now takes by devise. 3 & 4 WM. IV, c. 106, § 3. A doctrine of equal rigidity concerning appointments to remaindermen may well be preferable to the rule allowing an election. See 19 HARV. L. REV. 139. But whatever their comparative merits, the principal case seems to set an arbitrary limitation on the New York view. For where the donee of the power has appointed in part to others, and the balance to those who take on default, the appointees who are remaindermen take just what they would have received had the power not been exercised as to the balance, and they should have an equal right to elect to take under the original will.

QUASI-CONTRACTS — MONEY PAID UNDER DURESS OR COMPULSION OF LAW — THREAT OF LEGAL PROCEEDINGS. — In a suit to recover money paid under